ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: November 13, 1984

TO: Land Division File

FROM: William E. Zierath, DLPC/FOS-Central Region File

SUBJECT: LPC #16700000 - Sangamon County - Springfield/Fiat-Allis Construction
ILD #067406280

An Interim Status Standards Inspection was conducted at this heavy construction equipment manufacturing plant on November 13, 1984. Mr. Hurley Ballenger, Acting Plant Engineer, and Mr. Wayne Woelke, Manager of Plant Engineering, were interviewed. Mr. Rick Lanham, DLPC/FOS-Central Region, accompanied me on this inspection.

During the previous ISS inspection it was determined that this facility was generating a paint waste that was hazardous due to E.P. Toxicity for barium (D005). According to Mr. Ballenger, they had switched types of paint in November, 1983. Because of the need to flush the lines and clean out the paint solids from the old paint, they considered all paint wastes to be hazardous until April, 1984. An analysis of the paint waste from the new paint had a barium E.P. Toxicity value of 33ppm (the standard is 100ppm).

I reviewed the last two hazardous waste manifests. The wastes were hauled by Capitol Waste Systems (ILD#980700728). 990 gallons of D005 waste were shipped November 22, 1983. 1155 gallons of D005 waste were shipped April 11, 1984. Because there was a five month gap between the fairly large hazardous waste shipments, I asked when the first of the drums for the April, 1984 shipment had been generated. Mr. Ballenger said that, according to his records they did not generate any hazardous waste between November, 1983 and January 12, 1984. He said that the April 11, 1984 shipment had been arranged due to the impending expiration of the 90 day accumulation limit.

I asked about other waste streams. Mr. Ballenger explained that they had three non-hazardous waste streams: grinding sludge, emulsion oil, and an aqueous paint sludge. He said that they had gotten a permit to dispose of the now non-hazardous paint solids at Sangamon Valley Landfill (Auth. No. 83057).

I explained that they had reportedly ceased to generate hazardous waste, but, before our office was willing to consider the plant to be a non-generator, I would have to take a plant tour.

While we toured the main plant building we noted numerous 55 gallon drums. According to the labels on the drums they contained the alkaline soap, lubricating oil, hydraulic fluid, brake fluid, and transmission fluid. According to Mr. Ballenger very little of the lubricants left the plant as waste because the fluids on-site were used to fill the equipment before it left the site.

We then returned to Mr. Ballenger's office. I outlined the information I felt Mr. Ballenger would have to obtain before I could determine the plant's status under RCRA. This information included:

1. Identity and disposition of the material in the drums in the south part of the site.
2. The usage rate and disposal method of 1,1,1-trichloroethane.
3. The usage rate and disposal method of petroleum naphtha.
4. The identity, usage rate, and disposal method for the F140 Solvent.
5. The identity, generation rate, and disposal method for any other industrial process wastes generated at the plant, but previously unidentified.

At that point, we went to talk to Mr. Woelke to reiterate the above listed points. He pulled a stack of papers from his desk and said that, even though Mr. Ballenger did not know anything about them, he was working on getting rid of the drums on the south side of the site. Mr. Woelke said that he has been working on identifying the contents of the 90 drums. He looked startled when I informed him that I had counted 132 drums. He said that the drums had come from a Fiat-Allis plant in Deerfield that had closed down. He said that, as far as he was concerned, he wanted to get rid of the material. He said it was a project he should have started 6 months ago.

We asked them about waste oil. Mr. Ballenger said that a company from East St. Louis or somewhere else would pick up waste oil whenever they were called. Since waste oil at the plant was generated by draining new crankcases, transmissions or hydraulic hoses for repairs, they did not consider waste oil to be a waste. The waste oil was not manifested.

Mr. Woelke asked what might be the problem with the 1,1,1-trichloroethane. I explained that spent 1,1,1-trichloroethane was a listed hazardous waste.

Mr. Woelke and Mr. Ballenger both assured us that they would start right away to find the necessary information.

WEZ/RL/jf

cc: DLPC/FOS-Central Region File